

Remarks/Arguments:

Claims 1, 7, 8, 11, and 14 have been rejected under 35 U.S.C. §102(e) as being anticipated by Akatsu, et al. (U.S. Patent No. 6,496,862). It is respectfully submitted, however, that these claims are patentable over Akatsu for the reasons set forth below.

Applicants' invention, as recited by claim 1, includes a feature which is neither disclosed nor suggested by the art of record, namely:

. . . a virtual device . . . using table look-up to convert commands issued by each of the first and second devices into commands the second and first devices, respectively, comprehend so that the table includes correspondences between commands used in the first network and the second network for converting the commands between protocols used in the first network and the second network;

This feature is supported by the originally filed application at page 8, lines 9-13. No new matter has been added.

The Akatsu Reference discloses table look-up and table mapping at column 13, line 6. Akatsu's address mapping and Applicants' command mapping are completely different. Akatsu only discloses address translation. Thus, Akatsu is completely unable to allow interfacing between two devices that operate using completely different commands. With Akatsu, it is impossible for two devices that understand different commands to communicate. By contrast because Applicants have included a table that converts different commands, that devices that understand different commands are able to communicate with each other. As this feature is neither disclosed nor suggested by Akatsu, claim 1 is patentable over Akatsu.

Claim 8 is also patentable over Akatsu for reasons similar to those set forth above with regard to claim 1.

Application No.: 09/603,698
Amendment Dated: October 4, 2004
Reply to Office Action of: June 3, 2004

MAT-7983US

Claims 7, 11, and 14 are all patentable by virtue of their dependency on allowable independent claims.

Claims 2-6, 9, 10, 12 and 13 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Akatsu in view of Corcoran. These claims, however, include the features of the respective independent claims from which they depend. These claims are thus also patentable over the art of record.

In view of the amendments and arguments set forth above, the above-identified application is in condition for allowance which action is respectfully requested.

Respectfully submitted,

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Dated: October 4, 2004

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